

# EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Norfolk Division  
In Admiralty**

In the Matter of COEYMANS MARINE  
TOWING, LLC D/B/A CARVER MARINE  
TOWING as Owner and Operator of M/T  
Mackenzie Rose, (IMO No. 8968765), *et al.*

**Civil Action No. 2:24-cv-00490-MSD-LRL**

**DECLARATION OF CANNON MOSS**

I, Cannon Moss, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am the President of the Norfolk and Portsmouth Belt Line Railroad Company (“Belt Line”) and I have personal knowledge of the facts declared herein.
2. The Belt Line is the owner of the Main Line Railroad Bridge identified in the Belt Line’s claim in this case (“Main Line Bridge”).
3. The Main Line Bridge is a 385-foot-long steel vertical lift bridge with a clearance of 300 feet between the fenders spanning the Southern Branch of the Elizabeth River.
4. Based on available surveillance video described below, on June 15, 2024 at approximately 4:26 p.m EST, the M/T MACKENZIE ROSE, pushing the barge WEEKS 281, hit the Main Line Bridge on the Portsmouth side, outside the navigable channel, while the bridge was stationary in its raised position.
5. The impact caused extensive damage to the Main Line Bridge. Among other things, it pushed the steel superstructure nearly 7 feet leaving the western truss supported by 3 of its 4 legs, as shown in the photograph labeled NPBL000016. This photograph is attached as **Exhibit 1**.
6. I have reviewed the photograph produced by Carver (CARVER ESI 002045) taken by the crew of the tug on June 15, 2024 just after the impact and it accurately depicts the Main Line Bridge in its damaged state. This photograph is attached hereto as **Exhibit 2**.

7. On June 17, 2024, an employee of the Belt Line took a photograph of the damaged rails and steel superstructure on the western side of the bridge (NPBL 000016). I have reviewed this photograph and it accurately depicts the Main Line Bridge in its damaged state.

8. On or about June 17, 2024, I requested and received video surveillance footage of the M/T MACKENZIE ROSE pushing the barge WEEKS 281 and alliding with the Main Line Bridge from Elizabeth River Concrete, a neighboring industry, on the Portsmouth side of the river, produced in this case as NPBL0000201. The video produced as NPBL0000201 depicts the M/T MACKENZIE ROSE striking the western truss on the Portsmouth side of the Main Line Bridge.

9. Also on June 17, 2024, I secured video footage from the Main Line Bridge surveillance cameras that monitored vessel traffic approaching the bridge on June 15, 2024, which was produced in this case as NPBL0000207. The video produced as NPBL0000207 depicts the M/T MACKENZIE ROSE pushing a barge towards the Main Line Bridge on June 15, 2024. Moments after it passes out of the camera's view, the camera is shaken violently by the allision.

10. The Belt Line maintains the photograph and video surveillance footage of the Main Line Bridge produced by the Belt Line in this case in the course of its business.

11. The amount owing to the Belt Line to date from Carver as a result of the damage caused by the M/T MACKENZIE ROSE is \$15,542,871.55, not including interest, costs, attorneys' fees, or punitive damages.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 27, 2025.

  
Cannon Moss





NPBL000016



